

CHARLES L. HASTINGS
CA State Bar No.: 88599
NATALI A. RON
CA State Bar No.: 302927
Law Office of Hastings & Ron
PMB 270, 4719 Quail Lakes Drive, Suite G
Stockton, CA 95207
(209) 476-1010

Attorneys for JACKSON RANCHERIA DEVELOPMENT CORP

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

Case No: 19-30088 (DM)
Chapter 11

DECLARATION IN SUPPORT OF EX
PARTE APPLICATION TO FILE LATE
OPPOSITION TO REORGANIZED
DEBTORS' ONE HUNDRED TWENTIETH
OMNIBUS OBJECTION TO CLAIMS – BY
JACKSON RANCHERIA DEVELOPMENT
CORP (CLAIM NO. 3002)

Date: May 24, 2023
Time: 10:00 a.m.
Location: (Video/Teleconference Only)
U.S. Bankruptcy Court
Courtroom 17, 16th floor
San Francisco, CA 94102
Judge: Honorable Dennis Montali

I, NATALI A. RON, declare as follows:

1. I am the attorney of record for JACKSON RANCHERIA DEVELOPMENT
CORP, (hereinafter referred to as “Jackson”) the creditor in the above-captioned matter, which
filed Claim No. 3002 on or about May 15, 2019. I have personal knowledge of the matter set
forth herein, and if called upon to do so, could and would competently, truthfully, and accurately
testify hereto.

DECLARATION IN SUPPORT OF EX PARTE APPLICATION TO ALLOW CONSIDERATION OF
UNTIMELY FILING OF OPPOSITION TO OBJECTION TO CLAIM 3002 1

1 2. As set forth in the Reorganized Debtors' One Hundred Twentieth Omnibus
2 Objection to Claims, Jackson's claim was originally channeled to the Fire Victim Claims, and
3 preliminarily identified as a Fire Victim Claim to be administered, processed, settled, disallowed,
4 resolved, liquidated, satisfied, and/or paid by the Fire Victim Trust in accordance with its
5 governing documents. However, upon the discovery that this was not an appropriate Fire Victim
6 Claim, I notified the Fire Victim Claims administrator. After months of waiting and follow-up,
7 the claim was finally re-channeled to the appropriate General Unsecured Claims. I received
8 email confirmation of this on April 5, 2023. Approximately two weeks later, on April 14, 2023,
9 the subject Reorganized Debtors' One Hundred Twentieth Omnibus Objection to Claims was
10 filed.

11 3. I received the Reorganized Debtors' Report on Responses to One Hundred
12 Twentieth Omnibus Objection to Claims and Request for Order by Default as to Unopposed
13 Objections [Doc. No. 13738] in today's service email. Upon receipt, I immediately undertook
14 review to discover the motion to which this document applied, only to discover a service email
15 of April 14, 2023. I reviewed my calendar and emails to confirm how I did not previously see
16 this email. Because I had not previously received the Omnibus Objection, I inadvertently did not
17 timely file opposition thereto, which was due to be filed on May 10, 2023, in accordance with
18 this Court's ORDER APPROVING (A) PROCEDURES FOR FILING OMNIBUS
19 OBJECTIONS TO CLAIMS AND (B) THE FORM AND MANNER OF THE NOTICE OF
20 OMNIBUS OBJECTIONS. [Docket No. 8228].

21 4. It appears I received the filings via email on April 14, 2023, at 1:21 p.m.;
22 however, at that time, I was preparing for a non-retained expert deposition which was scheduled
23 to commence at 3:00 p.m., in the matter of *Irrigation Design & Construction, LLC v. Parker*
24 *Technical Sales*, Monterey County Superior Court case no.: 20CV003182. This matter was
25 scheduled for and proceeded to trial on May 8, 2023, and I am still in trial which I believe will
26 resume May 22, 2023. (We conducted four days of testimony, however, due to opposing
27 counsel's COVID-19 exposure, the matter has been delayed.)
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1 5. The Monday following e-service, which was April 17, 2023, I had an all-day
2 binding arbitration in the matter of *Jaspreet Singh v. Reedy Mechanical Inc.*, San Joaquin County
3 Superior Court case no.: STK-CV-UCC-2021-11339, which took place at ADR Services in
4 Oakland, California.

5 6. The week of April 17, 2023, I also had two retained expert witness depositions,
6 and two non-retained expert witness depositions in the matter of *Irrigation Design &*
7 *Construction, LLC v. Parker Technical Sales*. Between the five depositions in that two-week
8 period, preparation for and appearance at arbitration, and continued preparation for the Monterey
9 County Court trial, I inadvertently did not see the service email come through on the
10 Reorganized Debtors' One Hundred Twentieth Omnibus Objection to Claims.

11 7. This Court's Order Approving (A) Procedures for Filing Omnibus Objections To
12 Claims And (B) the Form and Manner of the Notice of Omnibus Objections sets forth the
13 Omnibus Claim Objection Notice procedure (paragraph F), which requires "the Omnibus Claim
14 Objection Notice [to] be served on the individual Claimant by mail, not less than 37 days before
15 the date set for hearing of the Omnibus Objection, at the address specified in the Proof of
16 Claim." However, I have no record of having received the One Hundred Twentieth Omnibus
17 Objection to Claims via mail. Upon review of the certificate of service, it appears Counsel's
18 office address is listed; however, my office now has a designated mailing address, and although
19 there is a change of address on file with the Post Office, and mail should be delivered to our Post
20 Mail Box, there have been many instances of mailing issues and mail being returned to sender.
21 As such, and in any event, I have not received the Omnibus Objection via mail.

22 8. Accordingly, and based on my inadvertent and excusable neglect, I am
23 respectfully requesting this Court to allow the late filing of Jackson's Opposition to the Omnibus
24 Objection, to consider it prior to the hearing scheduled for May 24, 2023, and to hear oral
25 argument on said matter.

26 9. There is no danger of prejudice to the Reorganized Debtors or their bankruptcy
27 estate in deeming the Creditor's Opposition to Objection to its claim as timely filed because
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1 there has been no plan confirmation, and no distributions have been made to general unsecured
2 creditors.

3 Executed under penalty of perjury under the laws of the State of California, this 18th day
4 of May 2023, at Stockton, California.

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6 BY: 
7 NATALI A. RON Attorney for JACKSON
8 RANCHERIA DEVELOPMENT CORP
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